

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BROWGLE Y RUSSELL and JAMES BURRIS,)	
)	
Plaintiffs,)	Case No. 1:20-cv-00420
)	
v.)	Judge LaShonda A. Hunt
)	
CITY OF CHICAGO,)	Magistrate Judge Heather K. McShain
)	
Defendant.)	

**DEFENDANT’S SECOND UNOPPOSED MOTION TO EXTEND THE BRIEFING
SCHEDULE ON MOTIONS FOR SUMMARY JUDGMENT**

Defendant City of Chicago (hereinafter the “City”), through the undersigned attorneys, respectfully submits its second UNOPPOSED Motion to Extend the Briefing Schedule for Motions for Summary Judgment, seeking to modify the briefing schedule, as follows:

1. This Court granted the City’s first unopposed motion to modify the briefing schedule for Motions for Summary Judgment, moving the filing due dates for the opening briefs from September 13 to September 20, 2024. (Dkt. 272) At that time, the City’s request was due to one of the City’s attorneys, Samantha Damewood, who was taking the lead in drafting the summary judgment submissions, suffering a tragic death in her family. She continues to be on a leave of absence to care for her family and herself.

2. The City has been diligently working on its Summary Judgment submissions. However, in the rush to file the first motion seeking the initial one-week extension from that Friday, September 13, 2024, the City’s attorney did not realize that the main affiant to support the City’s summary judgment motion was going to be out of town and unavailable for two weeks starting that following Monday, September 16 until September 27, 2024.

3. Therefore, the City respectfully requests another adjustment to the briefing schedule as follows: motions for summary judgment are to be filed by October 4, 2024; responses due November 1, 2024; and reply briefs due December 3, 2024 (due to the Thanksgiving holiday).

4. Plaintiffs' counsel has no objection to this Motion. As indicated in its first motion, Plaintiffs also intend to file a motion for summary judgment.

WHEREFORE, for the above stated reasons, Defendant City of Chicago respectfully requests this Court grant its Motion and enter an order revising the summary judgment briefing schedule as follows: motions for summary judgment are to be filed by October 4, 2024; responses due November 1, 2024; and reply briefs due December 3, 2024.

Dated: September 18, 2024

Respectfully submitted,

By: /s/ Jennifer A. Naber

Jennifer A. Naber

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CERTIFICATE OF SERVICE

I, Jennifer A. Naber, an attorney, certify that I caused the foregoing **Defendant's Second UNOPPOSED Motion to Extend the Summary Judgment Briefing Schedule** to be served on all parties of record via the Court's ECF filing system on this 18th day of September, 2024.

/s/ Jennifer A. Naber